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US EPA RECORDS CENTER REGION 5



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VIA FACSIMILE AND REGULAR MAIL

Michael Anastasio, Esq.
Assistant Regional Counsel
United States Environmental Protection Agency
77 West Jackson Boulevard, Mail Code CS-3T
Chicago, Illinois 60604-3590

Re: *Granville Solvents, Inc. Site*

Dear Mr. Anastasio:

The removal action being contemplated by the PRP Group includes two elements: gradient control for the plume and a water treatment plant upgrade to address any contaminants in the finish water which may exceed MCLs or risk based contaminant levels. The contemplated removal action was previously shared with EPA, Ohio EPA, and the Village of Granville. Questions raised by the agencies and the Village were addressed by the PRP Group during meetings and telephone conferences with each of these entities. The discussions concluded with no objections raised to the contemplated plan, and the Draft Administrative Order incorporates the proposed removal action contemplated by the PRP Group.

EPA has requested that the pump test for the gradient control aspect of the contemplated removal activity be commenced within 30 days. During the July 5 teleconference with EPA, the impracticality of that date was discussed and EPA requested that the PRP Group provide a time line for installation of the gradient control system. The PRP Group's consultant, Metcalf & Eddy, has developed a proposed time line which addresses temporary pumping and testing and a longer term gradient control system, however there are several contingencies which must be addressed before the time line can be finalized.

The PRP Group has been advised by Ohio EPA that treatment of the pumped water during the pump test may be required prior to discharge to Raccoon Creek, however, the extent of treatment that may be required has not yet been proposed by Ohio EPA. Final discharge limits will have to be selected in order to complete the final design for the gradient control system. Ohio EPA has not yet proposed the limits; Metcalf & Eddy is having discussions with Ohio EPA on this issue.

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The final contingency to be addressed is resolution of several matters raised in the Administrative Order on Consent proposed by EPA on June 28. The Steering Committee is reviewing the draft (the holiday prevented its distribution until July 5) and we anticipate providing comments to you in approximately one week.

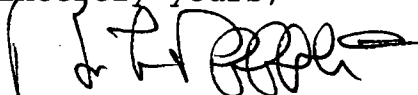
Metcalf & Eddy estimate that 60 days will be required for delivery of treatment equipment; therefore prompt resolution of ARARs and pump test treatment requirements will be imperative. In the event that governmental approvals take longer than indicated on the time line below, then successive dates must be extended accordingly.

The time line proposed by Metcalf & Eddy for the gradient control system is:

Milestone	Gradient Control	Days Total	Days (Calendar)
Temporary Pumping and Testing System			
General NPDES Permit Application (OWQS)		0	0
Application Approval (OEPA)		15	15
Temporary System Installation		45	60
Aquifer Pumping Test		30	90
Treatability Study		90	180
Gradient Control and Treatment System			
Draft Design Documents to EPA		45	180
EPA Comments on Design Documents		30	210
Final Design Documents to EPA		15	225
Approval of Design Documents		15	240
Begin Construction (Drilling)		15	255
Begin Construction (Source Treatment System)		45	300
TOTAL GRADIENT CONTROL			300

We look forward to discussing these issues with EPA further. Thank you for your continued cooperation, and should you have any questions, please do not hesitate to call me.

Sincerely yours,



Ben L. Pfefferle, III

cc: Steering Committee